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March 6, 2013

**VIA ELECTRONIC FILING**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
**Public Service Commission of South Carolina**  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: Petition of Progress Energy Carolinas, Incorporated for an Accounting Order to Adopt New Depreciation Rates Effective July 1, 2012 (Revised Filing)  
**Docket No. 2012-384-E**

Dear Ms. Boyd:

The South Carolina Office of Regulatory Staff ("ORS") has reviewed the Revised Filing in the above-referenced Docket as well as discussed this matter with Progress Energy Carolinas, Inc. ("Company") personnel and has no objection to the Company's proposed revision to include an adjustment to account for accelerated amortization on Clean Smokestacks projects that was erroneously omitted from the original filing.

ORS's position is predicated on the basis that the issuance of an accounting order in this matter will not preclude the Commission or any party from addressing the reasonableness of these rates in a subsequent general rate case or other proceeding.

Thank you for the opportunity to provide comments in this matter.

Sincerely,



John W. Flitter

JWF/swh

cc: Dan F. Arnett, Chief of Staff, SC ORS  
Nanette Edwards, Chief Counsel, Director of Legal Services, SC ORS  
Shannon Bowyer Hudson, Esquire, SC ORS  
Courtney Edwards, Esquire, SC ORS  
Timika Shafeek-Horton, Counsel, Progress Energy Carolinas, Inc.